

**BROWN & CONNERY, LLP**

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*Attorneys for the County of Camden, Camden County Police Department, John Scott Thomson, and Nicholas Marchiafava*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**XAVIER INGRAM,**

**Plaintiff,**

**vs.**

**COUNTY OF CAMDEN, CAMDEN  
COUNTY POLICE DEPARTMENT,  
JEREMY MERCK, ANTONIO  
GENNETTA, NICHOLAS  
MARCHIAFAVA, JOHN SCOTT  
THOMSON, ORLANDO CUEVAS, JOHN  
DOE(S) 1-50, and  
ABC ENTITIES 1-10.**

**Defendants.**

**CIVIL ACTION NO. 1:14-CV-05519**

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**NOTICE OF DEFENDANTS CAMDEN COUNTY, CAMDEN COUNTY POLICE  
DEPARTMENT, JOHN SCOTT THOMSON, AND NICHOLAS MARCHIAFAVA'S  
MOTION TO DISMISS ALL CLAIMS RELATING TO POST-HANDCUFFING  
MOVEMENTS OF INGRAM BY DEFENDANT MARCHIAFAVA  
PURSUANT TO FED. R. CIV. P. 50**

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**TO: Clerk, United States District Court**  
District of New Jersey  
Mitchell H. Cohen Federal Courthouse  
1 John F. Gerry Plaza  
Camden, New Jersey 08101  
**(VIA ELECTRONIC FILING)**

**ALL RECORD COUNSEL**  
**(VIA ELECTRONIC FILING)**

**PLEASE TAKE NOTICE** that the undersigned, on behalf of Defendants County of Camden, Camden County Police Department, Chief John Scott Thomson, and Nicholas Marchiafava, hereby move before the Honorable Juan R. Sánchez, C.J., for an Order dismissing all claims relating to post-handcuffing movements of Plaintiff Xavier Ingram by Defendant Marchiafava pursuant to Fed. R. Civ. P. 50.

**PLEASE TAKE FURTHER NOTICE** that the undersigned shall rely on the attached Brief in support of Motion. A proposed form of Order is also attached.

**PLEASE TAKE FURTHER NOTICE** that Defendants do not request oral argument unless timely opposition is filed.

Respectfully submitted,

**BROWN & CONNERY, LLP**

By: *s/ William F. Cook*  
William F. Cook

DATED: March 9, 2022